

<p>LAW OFFICES OF JAMES P. NOLAN & ASSOCIATES A Limited Liability Company</p>	<p>James P. Nolan, Jr., ID #004591987 Certified Criminal Trial Attorney Fredrick L. Rubenstein, ID #004651994 Eric L. Lange, ID #038441997 Admitted in NY & NJ Brian A. Bontempo, ID #151162016 Garry J. Clemente, ID #305992020 Sanford Rader – In Memoriam 1960-2018</p>
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November 7, 2023

Via Electronic Filing

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse, MLK 3C
50 Walnut Street,
Newark, New Jersey 07101

Re: Nijeer Parks v. John E. McCormac, et al.
Civil Action No. 2:21-cv-04021-MCA-LDW

Dear Judge Wettre:

Please accept this letter on behalf of Defendants, Township of Woodbridge Mayor John E. McCormac, Woodbridge Police Director Robert Hubner, Township of Woodbridge, Woodbridge Police Officer Andrew Lyszyk and Woodbridge Police Sergeant Joseph Licciardi (collectively herein, the "Woodbridge Defendants") in advance of the telephonic status conference scheduled with Your Honor on November 8, 2023.

Discovery in this matter has been completed. On September 28, 2023, the parties completed the deposition of Rockland County Intelligence Center Investigator Seamus Lyons. Both parties have exchanged expert reports. The Court has set a November 22, 2023 deadline for the filing of the Woodbridge Defendants' Motion for Summary Judgment.

Thank you for Your Honor's kind attention to this matter.

Respectfully,

/s/ Garry J. Clemente

Garry J. Clemente, Esq.
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/s/ Daniel W. Sexton

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